

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5**

**IN THE MATTER OF:**

Real Alloy, Inc.  
4525 U.S. 24 Business  
Wabash, Indiana 46992

**ATTENTION:**

**Gary Huddleston  
Environmental Manager**

**Request to Provide Information Pursuant to the Clean Air Act**

The U.S. Environmental Protection Agency is requiring Real Alloy, Inc. (Real Alloy or you) to submit certain information about the facility at 4525 U.S. 24 Business in Wabash, Indiana ("the facility"). Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. You must send this information to us within 30 calendar days after you receive this request.

We are issuing this information request under Section 114(a) of the Clean Air Act (the CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

Real Alloy owns and operates an emission source at the Wabash, Indiana facility. We are requesting this information to determine whether your emission source is complying with the Indiana State Implementation Plan, the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Secondary Aluminum Production, and its Title V Permit.

Real Alloy must send all required information to:

Attn: Compliance Tracker, AE-17J  
Air Enforcement and Compliance Assurance Branch  
U.S. Environmental Protection Agency  
Region 5  
77 W. Jackson Boulevard  
Chicago, Illinois 60604

Real Alloy must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1341.

As explained more fully in Appendix C, you may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice. You should be aware, moreover, that pursuant to Section 114(c) of the CAA and 40 C.F.R. § 2.301(a) and (f), emissions data, standards and limitations are not entitled to confidential treatment and shall be made available to the public notwithstanding any assertion of a business confidentiality claim. Appendix C provides additional information regarding the meaning and scope of the term "emissions data."

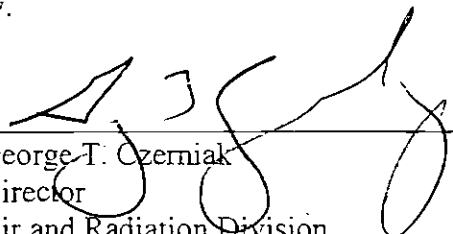
This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

We may use any information submitted in response to this request in an administrative, civil or criminal action.

Failure to comply fully with this information request may subject Real Alloy to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Alexandra Letuchy at (312) 886-6035 or at [letuchy.alexandra@epa.gov](mailto:letuchy.alexandra@epa.gov).

4/17/15  
Date

  
George T. Czerniak  
Director  
Air and Radiation Division

## **Appendix A**

When providing the information requested in Appendix B, use the following instructions and definitions.

### **Instructions**

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds and at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

### **Electronic Submissions**

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for "image over text" to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide submission on physical media such as compact disk, flash drive or similar item.
4. Provide a table of contents for each disk or drive so that each document can be accurately identified in relation to your response to a specific question. We recommend the use of electronic file folders organized by question number. In addition, each compact disk or flash drive should be labeled appropriately (e.g., Company Name, Disk 1 of 4 for Information Request Response, Date of Response).
5. Documents claimed as confidential business information (CBI) must be submitted on separate disks/drives apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI. Please follow the instructions in Appendix C for designating information as CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

### **Definitions**

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*, and 40 C.F.R. Part 63, Subpart RRR.

1. The terms "document" and "documents" shall mean any object that records, stores, or presents information, and includes writings, memoranda, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy, including any form or format of these. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support. All documents in hard copy should also include attachments to or enclosures with any documents.
2. The terms "relate to" or "pertain to" (or any form thereof) shall mean constituting, reflecting, representing, supporting, contradicting, referring to, stating, describing, recording, noting, embodying, containing, mentioning, studying, analyzing, discussing, evaluating or relevant to.
3. "Used Beverage Containers" shall mean either pre- or post-consumer aluminum beverage containers that have been coated with any of the following: paints, oils, lacquers, or laminates.

## Appendix B

### Information You Are Required to Submit to EPA

Real Alloy must submit the following information pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a) within 30 calendar days of its receipt of this letter.

1. Provide a copy of all final air permits issued to the facility by the Indiana Department of Environmental Management (IDEM) from January 2005 to the present, including, but not limited to, construction permits, minor source operating permits (MSOPs), federally enforceable state operating permits (FESOPs), and Part 70 Operating (Title V) Permits.
2. Provide a copy of all permit applications submitted to IDEM from January 2005 to the present. Also provide a copy of the original permit application for the current Title V Permit for the facility.
3. Provide copies of any deviation, excess emissions reports, or startup, shutdown, and malfunction reports submitted to IDEM since January 2010.
4. Provide copies of all quarterly reports, semi-annual compliance reports, or equivalent documents submitted to either IDEM or EPA since January 2010.
5. Provide copies of all annual emissions reports submitted to IDEM for the facility from 2005 to the present, and include:
  - a. A narrative describing the method used for the annual emissions calculations for each pollutant, including the basis of any emissions factors used;
  - b. Any documents outlining procedures for calculating annual emissions; and
  - c. A table describing the assumed/estimated capture efficiencies for each control device(s) and the associated emission unit(s), including any associated documentation for the assumptions.
6. Provide a table of all emissions tests conducted at the facility for any reason, from January 2005 to the present, and provide copies of all emissions test reports. Emission testing includes, but is not limited to, compliance testing, engineering testing, and testing for general information. Use the following guidelines for compiling the table and preparing copies of the stack test reports:
  - a. **Table** (in excel): Identify the emissions unit, the control device, the date of the test, pollutants tested, throughput during the test, and the test method(s) used. For each test during which the source was not operating at maximum design capacity, provide an explanation for why production was limited. Indicate whether the report was shared with IDEM.

- b. **Copies:** Provide full stack test reports, including the summary pages, the section describing the process parameters and production or processing rates at the time of the test, all test runs, charge logs, and all calculations.
- 7. Provide all documents, related to all studies, inspections, or evaluations conducted or attempted for any reason at the facility from January 2005 to the present, associated with air pollution control equipment and control systems, including but not limited to:
  - a. System improvements implemented based on findings of any study, inspection, or evaluation;
  - b. Modeling emissions of air pollutants to the atmosphere;
  - c. American Conference of Industrial Hygienist (ACGIH) calculations;
  - d. Ventilation of the furnaces, shredder, and dryers;
  - e. Capture and collection of pollutants emitted by the furnaces, shredder, and dryers;
  - f. Performance of the baghouse-ventilation-and-control system (including volumetric flow measurements and static pressure measurements); and
  - g. Commissioning reports.
- 8. For each emission unit equipped with an add-on air pollution control device, provide technical documentation verifying compliance with 40 C.F.R. § 63.1506(c)(1).
- 9. Provide a copy of the facility's current Operation, Maintenance, and Monitoring (OM&M) Plan, and any previous versions of the plan prepared from January 2010 to the present.
- 10. Provide a copy of the facility's current Startup, Shutdown, and Malfunction Plan, and any previous versions of the plan prepared from January 2010 to the present.
- 11. Provide copies of all Preventative Maintenance Plans, including but not limited to Preventative Maintenance Plans required for the baghouses and the afterburner.
- 12. For the scrap dryers afterburners, provide copies of the following information:
  - a. 3-hour block average operating temperatures at each afterburner from January 2010 to the present (in excel);
  - b. Minimum required operating temperature at each afterburner, the method used to establish the limit (e.g., performance test on date), and the effective date of this temperature limit from January 2010 to the present;
  - c. Minimum required residence time in afterburner, the method used to establish the limit and associated calculation (e.g., performance test on date), the effective date

of these residence times, and description of how the parameter is monitored to maintain compliance from January 2010 to the present; and

- d. Afterburner inspection records and documentation regarding maintenance, repairs, or other improvements to the afterburner initiated based on finding from inspections from January 2010 to the present.

13. For the scrap dryers baghouses, provide copies of the following information:

- a. 3-hour block average inlet temperatures at the fabric filter baghouse from 2010 to the present (in excel); and
- b. Maximum allowed fabric filter baghouse inlet temperature, the method used to establish the limit (e.g., performance test on date), and the effective date of these temperature limits from January 2010 to the present.

14. For the five reverberatory furnaces operating, identified as Furnaces #8, 10, 11, 14, and 17 in the Part 70 Operating Permit, provide copies of the following information:

- a. Dates and times any of the reverberatory furnaces were operated as a Group 2 furnace;
- b. 3-hour block average inlet temperature for each fabric filter baghouse from January 2010 to the present (in excel);
- c. Maximum allowable fabric filter baghouse inlet temperature, the method used to establish the limit (e.g., performance test on date), and the effective date of these temperatures from January 2010 to the present;
- d. Records of daily inspections of the continuous lime injection system feed hopper from January 2010 to the present;
- e. Approval from the permitting agency, on the installation of an alternative system to confirm that lime is free-flowing;
- f. Records of the lime feed rate/screw speed, alarm setpoint, and records of alarms from January 2010 to the present;
- g. Minimum lime feed rate established for each fabric filter baghouse during a performance test and the effective date of these minimum feed rates from January 2010 to the present;
- h. Records of the total reactive chlorine flux injection-rate from January 2010 to the present (15-minute blocks and calculation for each operating cycle/time period used during performance tests in excel); and



- i. Maximum total reactive chlorine flux injection rate established for each fabric filter baghouse during a performance test and the effective date of these minimum feed rates from January 2010 to the present.
15. Provide the following information regarding all bag leak detection systems (BLDSs) in use at the facility:
  - a. The emission point, air pollution control unit, and process associated with each BLDS;
  - b. The manufacturer's guidance documents, including, but not limited to, the manufacturer's written specifications and recommendations, used for establishing alarm setpoints, response times, and delay times (note which document is associated with which emission point/BLDS);
  - c. All operation and maintenance documents used for establishing alarm setpoints, response, times, and delay times (note which document is associated with which emission point/BLDS);
  - d. A copy of a typical day BLDS chart for each emission point/BLDS;
  - e. BLDS baseline sensor reading (%) and cleaning peak reading (%) for each BLDS;
  - f. The alarm setpoints, response time, and delays used for each BLDS from January 2010 to the present;
  - g. The data used to justify each modification of either an alarm setpoints, response time, and delays, and a narrative description of why the modification was appropriate;
  - h. Documentation submitted to EPA or IDEM for approval for a modification of an alarm;
  - i. All records maintained to demonstrate compliance with to 40 C.F.R. § 63.1506(g)(2), including, but not limited to: time and date of triggered alarms, time and type of corrective action initiated to determine cause of alarm, time and date the corrective action was initiated, time and date the corrective action was completed, and calculated operating time fraction BLDS alarms; and
  - j. The percentage of operating time each BLDS was in alarm during each 6 month reporting block from January 2010 to the present.
16. Provide records of annual inspections of emission capture/control and closed vent systems from January 2010 to the present.
17. Provide the monthly records of the total scrap aluminum processed (in tons) at each reverberatory furnace from January 2005 to the present, include a 12 month rolling sum.

18. Provide documentation of corrective actions taken where process parameters or add-on air pollution control device operating parameters deviated from the value or range established during the performance test and incorporated in the OM&M plan from January 2010 to the present.
19. Provides copies of all charge logs from January 2010 to the present and a list of dates that the furnaces were charged with materials that do not meet the definition of clean charge in 40 C.F.R. § 63.1503. Note if any of these dates were also dates of performance tests.
20. Provide the following documentation regarding the charging of Used Beverage Containers into furnaces at the facility from January 2010 to the present.
  - a. Charge logs or records;
  - b. Charge limits and performance tests establishing limits; and
  - c. Performance tests that included the charging of Used Beverage Containers.

## **Appendix C**

### **Confidential Business and Personal Privacy Information**

#### **Assertion Requirements**

You may assert a business confidentiality claim covering any parts of the information requested in the attached Appendix B, as provided in 40 C.F.R. § 2.203(b).

Emission data provided under Section 114 of the CAA, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2.

“Emission data” means, with reference to any source of emissions of any substance into the air:

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. § 2.301(a)(2)(i)(A), (B) and (C).

To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document for which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a caption or other suitable form of notice to indicate the intent to claim confidentiality. The stamped or typed caption or other suitable form of notice should employ language such as “trade secret” or “proprietary” or “company confidential” and indicate a date, if any, when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by EPA only to the extent permitted and by means of the procedures set forth at Section 114(c) of the CAA and 40 C.F.R. Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the Request to Provide Information as a waiver of that claim, and the information may be made available to the public without further notice to you.

## Determining Whether the Information is Entitled to Confidential Treatment

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. § 2.208, which provides in part that you must satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; that the information is not and has not been reasonably obtainable by legitimate means without your consent and that disclosure of the information is likely to cause substantial harm to your business's competitive position.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking that you support your confidential business information (CBI) claim. If you receive such a letter, you must respond within the number of days specified by EPA. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential **by page, paragraph, and sentence**. Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you identify as being CBI, EPA will ask that you answer the following questions, giving as much detail as possible:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a special event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question number 1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, **explain with specificity** why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
8. Is there any other information you deem relevant to EPA's determination regarding your claim of business confidentiality?

If you receive a request for a substantiation letter from the EPA, **you bear the burden of substantiating your confidentiality claim.** Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

### **Personal Privacy Information**

Please segregate any personnel, medical and similar files from your responses and include that information on a separate sheet(s) marked as "Personal Privacy Information." Disclosure of such information to the general public may constitute an invasion of privacy.

**CERTIFICATE OF MAILING**

I, Loretta Shaffer, certify that I sent a Request to Provide

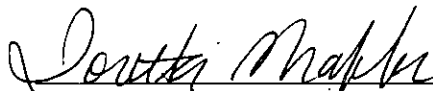
Information Pursuant to the Clean Air Act by Certified Mail, Return Receipt Requested, to:

Real Alloy, Inc.  
Attn: Gary Huddleston, Environmental Manager  
4525 U.S. 24 Business,  
Wabash, Indiana 46992

I also certify that I sent a copy of the Request to Provide Information Pursuant to the  
Clean Air Act by First-Class Mail to:

Phil Perry, Chief  
Air Compliance and Enforcement Branch  
Indiana Department of Environmental Management  
100 N. Senate Ave.  
Mail Code 61-53 IGCN 1003  
Indianapolis, IN 46204-2251

On the 20 day of April 2015.



Loretta Shaffer, Program Technician  
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 7009 1680 0000 7676 1727